



Montana Department of
ENVIRONMENTAL QUALITY

Marc Racicot, Governor

P.O. Box 200901 • Helena, MT 59620-0901 • (406) 444-2544 • E-mail: www.deq.state.mt.us

November 3, 2000

Guy A. Foy
Flathead County Road Department
800 South Main Street
Kalispell, MT 59901

Dear Mr. Foy:

Air Quality Permit #0310-02 is deemed final as of November 3, 2000 by the Department of Environmental Quality. This permit is for a modification of permit #0310-01 to correctly identify the generator, used in operating the facility, as a Detroit diesel generator. All conditions of the department's decision remain the same. Enclosed is a copy of your permit with the final date indicated.

For the department,

David L. Klemp
Air Permitting Section Supervisor
Air & Waste Management Bureau
(406) 444-3490

DK:jw

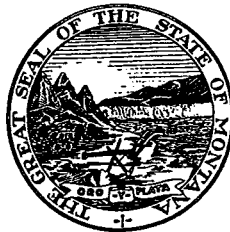
Enclosure

Montana Department of Environmental Quality
Permitting and Compliance Division

Air Quality Permit #0310-02

Flathead County Road Department
800 South Main Street
Kalispell, Montana 59901

November 3, 2000



AIR QUALITY PERMIT

Issued To: Flathead County Road Department Permit #0310-02
800 South Main
Kalispell, MT 59901
Modification Request Received: 8/31/00
Department Decision on Modification: 10/18/00
Permit Final: 11/03/00
AFS #777-0310

An air quality permit, with conditions, is hereby granted to Flathead County Road Department (Flathead), pursuant to Section 75-2-204 and 211 of the Montana Code Annotated (MCA), as amended, and the Administrative Rules of Montana (ARM) 17.8.701, *et seq.*, as amended, for the following:

Section I: Permitted Facilities

A. Permitted Equipment:

A portable 2000 ADM RB250 Road Builder Series asphalt plant and associated equipment. Emissions from the drum mix plant will be controlled by a 2000 ADM Baghouse. A complete equipment list is included with the permit analysis.

B. Original Location:

The initial site location will be North of 1333 Hold Stage Road at the SE¼ of the SE¼ of Section 3, Township 28 North, Range 21 West, Flathead County, Montana. Permit #0310-02 applies while operating in any location in the State of Montana, except within those areas having a Department of Environmental Quality (department) approved permitting program. A Missoula County air quality permit is required for locations within Missoula County.

C. Current Permit Action:

The current permit action is to correctly identify the generator used in operating the 2000 ADM RB250 Road Builder Series asphalt plant as a Detroit diesel generator (900 kw). The generator was incorrectly identified as a Cat diesel generator (900 kw) in permit #0310-01. Permit # 0310-02 will replace 0310-01.

Section II: Limitations and Conditions

A. Emission Limitations:

1. Asphalt plant particulate matter emissions shall be limited to 0.04 gr/dscf (ARM 17.8.340, ARM 17.8.715, and 40 CFR 60 Subpart I).
2. Flathead shall not cause or authorize to be discharged into the atmosphere, from the asphalt plant, stack emissions that exhibit 20% opacity or greater averaged over 6 consecutive minutes (ARM 17.8.340, ARM 17.8.715, and 40 CFR 60 Subpart I).
3. Flathead shall not cause or authorize to be discharged into the atmosphere from systems for screening, handling, storing, and weighing hot aggregate; systems for loading, transferring, and storing mineral filler; systems for mixing hot mix asphalt; and the loading, transfer, and storage systems associated with emission control systems, any visible emissions that exhibit opacity of 20% or greater averaged over 6 consecutive minutes (ARM 17.8.340, ARM 17.8.715, and 40 CFR 60 Subpart I).
4. Flathead shall not cause or authorize the use of any street, road, or parking lot without taking reasonable precautions to control visible fugitive emissions of airborne particulate matter that exhibit an opacity of 5% or greater (RACT).
5. Flathead shall treat all unpaved portions of the haul roads, access roads, and the general plant area with water and/or chemical dust suppressant as necessary to maintain compliance with the reasonable precautions limitation in Section II.A.4 (RACT).
6. A baghouse for air pollution control, with a device to measure the pressure drop (magnehelic gauge, manometer, etc.), must be installed and maintained. Pressure drop must be measured in inches of water. Temperature indicators at the control device inlet and outlet must be installed and maintained. Pressure drop on the control device and temperature must be recorded daily and kept on site according to Section II.C.2 (ARM 17.8.715).
7. Once a stack test is performed, the asphalt plant production rate shall be limited to the average production rate during the last source test demonstrating compliance (ARM 17.8.710).
8. The total plant production shall be limited to 1,314,000 tons during any rolling 12-month time period (ARM 17.8.710).

9. The operation of the Detroit diesel generator shall not exceed 5,700 hours during any rolling 12-month time period (ARM 17.8.710).
10. If the permitted equipment is used in conjunction with any other equipment owned or operated by Flathead, at the same site, production shall be limited to correspond with an emission level that does not exceed 250 tons during any rolling 12-month time period. Any calculations used to establish production levels shall be approved by the department (ARM 17.8.710).
11. Flathead shall comply with all applicable standards and limitations and the reporting, recordkeeping, and notification requirements contained in 40 CFR Part 60 Subpart I, as it applies to this asphalt operation.

B. Emission Testing:

1. Within 60 days after achieving maximum production rate, but no later than 180 days after initial start up of the equipment listed in Section I.A of the permit analysis, EPA Methods 1-5 and 9 source tests shall be concurrently performed on the asphalt plant to demonstrate compliance with Section II.A.1 and Section II.A.2 (ARM 17.8.105 and ARM 17.8.710).
2. EPA Methods 1-5 and 9 source tests must be performed on the asphalt plant every 4 years after the initial source test, or according to another testing/monitoring schedule as may be approved by the department, to demonstrate compliance with the conditions specified in Section II.A.1 and II.A.2 (ARM 17.8.105 and ARM 17.8.710).
3. Pressure drop on the control device and temperatures must be recorded during the test and reported as part of the test results specified in Section II.C.2 (ARM 17.8.710).
4. All source tests must be conducted in accordance with the Montana Source Test Protocol and Procedures Manual (ARM 17.8.106).
5. Since asphalt production will be limited to the average production rate during the test, it is suggested the test be performed at the highest production rate practical. Flathead may retest at any time in order to test at a higher production rate (ARM 17.8.710).
6. The department may require further testing (ARM 17.8.105).

C. Reporting Requirements:

1. If this asphalt plant is moved to another location, a Notice of Intent to Transfer Location of Air Quality Permit must be sent to the department. In addition, a Public Notice Form of Change of Location must be published in a newspaper of general circulation in the area to which the transfer is to be made. This Change of Location Notice must be published at least 15 days prior to the move. The Intent to Transfer Form and the proof of publication (affidavit) of the Change of Location Form must be submitted to the department prior to the move. These forms are available from the department (ARM 17.8.734).
2. Flathead shall maintain on-site records showing daily hours of operation, daily production rates, and daily pressure drop and temperature readings for the last 12 months. The records compiled in accordance with this permit shall be maintained by Flathead as a permanent business record for at least 5 years following the date of the measurement, shall be submitted to the department upon request, and shall be available at the plant for inspection by the department (ARM 17.8.710).
3. Flathead shall supply the department with annual production information for all emission points, as required by the department in the annual emission inventory request. The request will include, but is not limited to, all sources identified in the most recent emission inventory report and sources identified in Section I.A of the permit analysis.

Production information shall be gathered on a calendar-year basis and submitted to the department by the date required in the emission inventory request. Information shall be in units as required by the department (ARM 17.8.505).
4. Flathead shall document, by month, the total production from the 2000 ADM RB250 Road Builder Series asphalt plant. By the 25th of each month, Flathead shall total the production from the asphalt plant during the previous 12 months to verify compliance with the limitation in Section II.A.8. A written report of the compliance verification shall be submitted along with the annual emissions inventory (ARM 17.8.710).
5. Flathead shall document, by month, the total hours of operation for the Detroit diesel generator. By the 25th of each month, Flathead shall total the hours of operation for the diesel generator during the previous 12 months to verify compliance with the limitation in Section II.A.9. A written report of the compliance verification shall be submitted along with the annual emissions inventory (ARM 17.8.710).

6. Flathead shall notify the department of any construction or improvement project conducted pursuant to ARM 17.8.705(1)(r) that would include a change in control equipment, stack height, stack diameter, stack flow, stack gas temperature, source location, or fuel specifications, or would result in an increase in source capacity above its permitted operation or the addition of a new emission unit. The notice must be submitted to the department, in writing, 10 days prior to start up or use of the proposed de minimis change, or as soon as reasonably practicable in the event of an unanticipated circumstance causing the de minimis change, and must include the information requested in ARM 17.8.705(1)(r)(iv)(ARM 17.8.705).

Section III: General Conditions

- A. Inspection - The recipient shall allow the department's representatives access to the source at all reasonable times for the purpose of making inspections or surveys, collecting samples, obtaining data, auditing any monitoring equipment (CEMS, CERMS) or observing any monitoring or testing, and otherwise conducting all necessary functions related to this permit.
- B. Waiver - The permit and all the terms, conditions, and matters stated herein shall be deemed accepted if the recipient fails to appeal as indicated below.
- C. Compliance with Statutes and Regulations - Nothing in this permit shall be construed as relieving the permittee of the responsibility for complying with any applicable federal or Montana statute, rule or standard, except as specifically provided in ARM 17.8.701, *et seq.* (ARM 17.8.717).
- D. Enforcement - Violations of limitations, conditions and requirements contained herein may constitute grounds for permit revocation, penalties or other enforcement as specified in Section 75-2-401, *et seq.*, MCA.
- E. Appeals - Any person or persons jointly or severally adversely affected by the department's decision may request, within 15 days after the department renders its decision, upon affidavit setting forth the grounds therefore, a hearing before the Board of Environmental Review (Board). A hearing shall be held under the provisions of the Montana Administrative Procedures Act. The department's decision on the application is not final unless 15 days have elapsed and there is no request for a hearing under this section. The filing of a request for a hearing postpones the effective date of the department's decision until the conclusion of the hearing and issuance of a final decision by the Board.
- F. Permit Inspection - As required by ARM 17.8.716, Inspection of Permit, a copy of the air quality permit shall be made available for inspection by department personnel at the location of the permitted source.

- G. Construction Commencement - Construction must begin within 3 years of permit issuance and proceed with due diligence until the project is complete or the permit shall be revoked.
- H. Permit Fees - Pursuant to Section 75-2-220, MCA, as amended by the 1991 Legislature, the continuing validity of this permit is conditional upon the payment by the permittee of an annual operation fee as required by that Section and rules adopted thereunder by the Board.
- I. The department may modify the conditions of this permit based on local conditions of any future site. These factors may include, but are not limited to, local terrain, meteorological conditions, proximity to residences, etc.
- J. Flathead shall comply with the conditions contained in this permit while operating at any location in the State of Montana, except within those areas having a department approved permitting program.

Permit Analysis
Flathead County Road Department
Permit #0310-02

I. Introduction/Process Description

A. Permitted Equipment

A portable 2000 ADM RB250 Road Builder Series asphalt plant (250 TPH), elevators, screens, bins, mixer, Detroit diesel generator (900 kw), and associated equipment. Emissions from the drum mix plant will be controlled by a 2000 ADM Baghouse.

B. Process Description

The asphalt process begins at the four cold bin feeders. Gravel is transferred to the collective conveyor assembly. The mix is then transferred to the scalping screen and weighing conveyor, then sent via high-speed conveyor to the mixing drum, where hot mix is added. During the mixing process, dust is sent into the baghouse where the dust particles are removed from the air by a vacuum process and returned to the mixing drum and processed into the mix. The asphalt drops out of the mix drum into an enclosed paddle conveyor that deposits the mix into the silo.

C. Permit History

On June 10, 1971, Flathead was issued permit #0310-00 for the operation of a 1970 Barber Green DA Hot Mix Plant (150 TPH) with a cone dust collector (model CB 55) and a wet collector (model CL 63). The plant was initially located at the Steel Bridge Pit in the SE ¼ of the SE¼ of Section 3, Township 28 North, Range 21 West, Flathead County, Montana. On September 15, 1993, a stipulation was finalized to keep the 1970 Barber Green asphalt plant in compliance with the particulate matter National Ambient Air Quality Standard (NAAQS) for a "moderate" PM-10 non-attainment area, as the facility location was designated by EPA.

On August, 8, 2000, Flathead was issued permit #0310-01 for the replacement of a 1970 Barber Green DA Hot Mix Plant (150 TPH) with a 2000 ADM RB250 asphalt plant (250 TPH), and the addition of a Cat diesel generator (900 kw). Both plants were modeled using screen view to compare the potential impacts associated with each facility. Based on the modeling results, operational limits were placed on the new plant to ensure that the impacts would be less than or equal to the impacts from the old plant.

D. Current Permit Action

The current permit action is to correctly identify the generator used in the operation of the 2000 ADM RB250 Road Builder Series asphalt plant as a Detroit diesel generator (900 kw). The generator was incorrectly identified as a Cat diesel generator (900 kw) in permit #0310-01. Permit #0310-02 replaces permit #0310-01.

E. Additional Information

Additional information, such as applicable rules and regulations, Best Available Control Technology (BACT)/Reasonably Available Control Technology (RACT) determinations, air quality impacts, and environmental assessments, is included in the initial analysis associated with each change to the permit.

II. Applicable Rules and Regulations

The following are partial explanations of some applicable rules and regulations that apply to the facility. The complete rules are stated in the Administrative Rules of Montana (ARM) and are available, upon request, from the Department of Environmental Quality (department). Upon request, the department will provide references for locations of complete copies of all applicable rules and regulations or copies where appropriate.

A. ARM 17.8, Subchapter 1, General Provisions, including, but not limited to:

1. ARM 17.8.101 Definitions. This rule is a list of applicable definitions used in this chapter, unless indicated otherwise in a specific subchapter.
2. ARM 17.8.105 Testing Requirements. Any person or persons responsible for the emission of any air contaminant into the outdoor atmosphere shall upon written request of the department provide the facilities and necessary equipment (including instruments and sensing devices) and shall conduct tests, emission or ambient, for such periods of time as may be necessary using methods approved by the department. The department has determined, for the asphalt plant, that testing every 4 years, or according to another testing/monitoring schedule as may be approved by the department, is necessary.
3. ARM 17.8.106 Source Testing Protocol. The requirements of this rule apply to any emission source testing conducted by the department, any source, or other entity as required by any rule in this chapter, or any permit or order issued pursuant to this chapter, or the provisions of the Clean Air Act of Montana, 75-2-101, *et seq.*, Montana Code Annotated (MCA).

Flathead shall comply with all requirements contained in the Montana Source Test Protocol and Procedures Manual, including, but not limited to, using the proper test methods and supplying the required reports. A copy of the Montana Source Test Protocol and Procedures Manual is available from the department upon request.

4. ARM 17.8.110 Malfunctions. The department must be notified promptly by telephone whenever a malfunction occurs that can be expected to create emissions in excess of any applicable emission limitation, or to continue for a period greater than 4 hours.

5. ARM 17.8.111 Circumvention. No person shall cause or permit the installation or use of any device or any means which, without resulting in reduction in the total amount of air contaminant emitted, conceals or dilutes an emission of air contaminant which would otherwise violate an air pollution control regulation. No equipment that may produce emissions shall be operated or maintained in such a manner that a public nuisance is created.

B. ARM 17.8, Subchapter 2, Ambient Air Quality, including, but not limited to:

1. ARM 17.8.210 Ambient Air Quality Standards for Sulfur Dioxide,
2. ARM 17.8.211 Ambient Air Quality Standards for Nitrogen Dioxide,
3. ARM 17.8.212 Ambient Air Quality Standards for Carbon Monoxide,
4. ARM 17.8.220 Ambient Air Quality Standards for Settled Particulate Matter,
and
5. ARM 17.8.223 Ambient Standards for PM-10.

Flathead must comply with the applicable ambient air quality standards.

C. ARM 17.8, Subchapter 3, Emission Standards, including, but not limited to:

1. ARM 17.8.304 Visible Air Contaminants. This rule requires that no person may cause or authorize emissions to be discharged into the outdoor atmosphere from any source installed after November 23, 1968, that exhibit an opacity of 20% or greater averaged over 6 consecutive minutes.
2. ARM 17.8.308 Particulate Matter, Airborne. Under this section, Flathead shall not cause or authorize the use of any street, road, or parking lot without taking reasonable precautions to control emissions of airborne particulate matter.
3. ARM 17.8.309 Particulate Matter, Fuel Burning Equipment. This section requires that no person shall cause, allow, or permit to be discharged into the atmosphere particulate matter caused by the combustion of fuel in excess of the amount determined by this section.
4. ARM 17.8.310 Particulate Matter, Industrial Process. This section requires that no person shall cause, allow, or permit to be discharged into the atmosphere particulate matter in excess of the amount set forth in this section.
5. ARM 17.8.322 Sulfur Oxide Emissions--Sulfur in Fuel. Commencing July 1, 1971, no person shall burn any gaseous fuel containing sulfur compounds in excess of 50 grains per 100 cubic feet of gaseous fuel, calculated as hydrogen sulfide at standard conditions.

6. ARM 17.8.340 Standard of Performance for New Stationary Sources. The owner and operator of any stationary source or modification, as defined and applied in 40 CFR Part 60, shall comply with the standards and provisions of 40 CFR Part 60. This plant consists of a portable 2000 ADM RB250 Road Burner Series asphalt plant (maximum production rate 250 TPH) and associated equipment; therefore, NSPS (40 CFR Part 60, Subpart A General Provisions, and Subpart I Hot Mix Asphalt Facilities) does apply.

D. ARM 17.8, Subchapter 5, Air Quality Permit Application, Operation and Open Burning Fees, including, but not limited to:

1. ARM 17.8.504 Air Quality Permit Application Fees. Flathead shall submit an air quality permit application fee concurrent with the submittal of an air quality permit application. A permit application is incomplete until the proper application fee is paid to the department. Flathead was not required to submit a permit application fee for the current permit modification.
2. ARM 17.8.505 Air Quality Operation Fees. An annual air quality operation fee must, as a condition of continued operation, be submitted to the department by each source of air contaminants holding an air quality permit, excluding an open burning permit, issued by the department. The air quality operation fee is based on the actual or estimated actual amount of air pollutants emitted during the previous calendar year.

An air quality operation fee is separate and distinct from an air quality permit application fee. The annual assessment and collection of the air quality operation fee, described above, shall take place on a calendar-year basis. The department may insert into any final permit issued after the effective date of these rules, such conditions as may be necessary to require the payment of an air quality operation fee on a calendar-year basis, including provisions which prorate the required fee amount.

E. ARM 17.8, Subchapter 7, Permit, Construction and Operation of Air Contaminant Sources, including, but not limited to:

1. ARM 17.8.704 General Procedures for Air Quality Preconstruction Permitting. An air quality preconstruction permit shall contain requirements and conditions applicable to both construction and subsequent use of the permitted equipment.
2. ARM 17.8.705 When Permit Required--Exclusions. This rule requires a facility to obtain an air quality permit if they construct, alter, or use an asphalt plant which has the potential to emit more than 5 tons per year of any pollutant. Flathead has the potential to emit more than 5 tons per year of particulate matter, PM-10, NO_x, VOC, CO, and SO_x; therefore, a permit is required.

3. ARM 17.8.706 New or Altered Sources and Stacks--Permit Application Requirements. This rule requires that an application for an air quality permit be submitted for a new or altered source or stack. Flathead was not required to submit a permit application for the current permit modification.
4. ARM 17.8.710 Conditions for Issuance of Permit. This rule requires that the source demonstrate compliance with applicable rules and standards before a permit can be issued. Also, a permit may be issued with such conditions as are necessary to assure compliance with all applicable rules and standards. Flathead has demonstrated compliance with applicable rules and standards as required for permit issuance.
5. ARM 17.8.715 Emission Control Requirements. Flathead is required to install on a new or altered source the maximum air pollution control capability which is technically practicable and economically feasible, except that BACT shall be utilized. A BACT review was not required for the current permit modification.
6. ARM 17.8.716 Inspection of Permit. This rule requires that air quality permits shall be made available for inspection by the department at the location of the source.
7. ARM 17.8.717 Compliance with Other Statutes and Rules. This rule states that nothing in the permit shall be construed as relieving Flathead of the responsibility for complying with any applicable federal or Montana statute, rule or standard, except as specifically provided in ARM 17.8.101, et seq.
8. ARM 17.8.720 Public Review of Permit Applications. This rule requires that Flathead notify the public by means of legal publication in a newspaper of general circulation in the area affected by the application for a permit. Flathead was not required to submit an affidavit of publication for the current permit modification.
9. ARM 17.8.731 Duration of Permit. An air quality permit shall be valid until revoked or modified as provided in this subchapter, except that a permit issued prior to construction of a new or altered source may contain a condition providing that the permit will expire unless construction is commenced within the time specified in the permit, which in no event may be less than 1 year after the permit is issued.
10. ARM 17.8.733 Modification of Permit. An air quality permit may be modified for changes in any applicable rules or standards adopted by the Board or changed conditions of operation at a source or stack, which do not result in an increase in emissions because of the changed conditions of operation. A source may not increase its emissions beyond those found in its permit unless the source applies for and receives another permit.

11. ARM 17.8.734 Transfer of Permit. An air quality permit may be transferred from one location to another if written notice of intent to transfer is sent to the department.

F. ARM 17.8, Subchapter 8, Prevention of Significant Deterioration of Air Quality, including, but not limited to:

1. ARM 17.8.801 Definitions. This rule is a list of applicable definitions used in this subchapter.
2. ARM 17.8.818 Review of Major Stationary Sources and Major Modifications--Source Applicability and Exemptions. The requirements contained in ARM 17.8.819 through ARM 17.8.827 shall apply to any major stationary source and any major modification with respect to each pollutant subject to regulation under the Federal Clean Air Act (FCAA) that it would emit, except as this subchapter would otherwise allow.

This facility is not a major stationary source, because it is not a listed source and does not have the potential to emit 250 tons per year (excluding fugitive emissions) or more of any air pollutant.

G. ARM 17.8, Subchapter 12, Operating Permit Program Applicability, including, but not limited to:

1. ARM 17.8.1201 Definitions. (23) Major Source under Section 7412 of the Federal Clean Air Act (FCAA) is defined as any stationary source having:
 - a.
 - i. Potential To Emit (PTE) > 10 tons/year of any one hazardous air pollutant (HAP),
 - ii. PTE > 25 tons/year of a combination of all HAPs, or
 - iii. Lesser quantity as the department may establish by rule.
 - b. PTE > 100 tons/year of any pollutant.
 - c. Sources with PTE > 70 tons/year of PM-10 in a serious PM-10 non-attainment area.
2. ARM 17.8.1204 Air Quality Operating Permit Program Applicability. Title V of the FCAA Amendments of 1990 requires that all sources, as defined in ARM 17.8.1204 (1), obtain a Title V Operating Permit. In reviewing and issuing Air Quality Permit #0310-02 for Flathead, the following conclusions were made:
 - a. The facility's PTE is less than 100 tons/year for all criteria pollutants.
 - b. The facility's PTE is less than 10 tons/year of any one HAP and less than 25 tons/year of all HAPs.
 - c. This source is not located in a serious PM-10 nonattainment area.
 - d. This facility is subject to a current NSPS.

- e. This facility is not subject to any current NESHAP standards.
- f. This source is not a Title IV affected source nor a solid waste combustion unit.
- g. This source is not an EPA designated Title V source.

If minor sources subject to NSPS are required to obtain a Title V Operating Permit, Flathead will be required to obtain an Operating Permit.

III. Emission Inventory--Permit #0310-02

Source	tons/year					
	TSP	PM-10	NO _x	VOC	CO	SO _x
2000 Asphalt Drum Mix Plant / with Baghouse	36.99	18.50	19.71	33.51	36.79	2.17
Elevator, Screens, Bins, and Mixer	24.64	19.71				
Cold Aggregate Handling	32.85	26.28				
Detroit Diesel Generator (900 kw)	0.63	1.72	59.60	0.64	4.95	19.84
Asphalt Heater			19.71	17.08	36.79	2.17
Pile Forming	2.76	1.21				
Haul Roads	2.74	1.23				
Total	100.61	68.65	99.02	51.23	78.53	24.18

*Based on operating 5700 hours/year

* A complete emission inventory for permit #0310-02 is on file with the department.

IV. Best Available Control Technology Analysis

A BACT determination is required for any new or altered source. Flathead shall install on the new or altered source the maximum air pollution control capability which is technology practicable and economically feasible, except that Best Available Control Technology shall be utilized. A BACT analysis is not required for this permit modification because there are no new or altered sources being permitted at this time.

V. Existing Air Quality Impacts

This permit is for a portable asphalt plant to be located in the SE¼ of the SE¼ of Section 3, Township 28 North, Range 21 West, Flathead County, Montana. In the view of the department, the amount of controlled particulate emissions generated by this project will not cause concentrations in the ambient air that exceed the set standard.

On July 1, 1987 the Environmental Protection Agency (EPA) promulgated new NAAQS for particulate matter with an aerodynamic diameter of 10 microns or less (PM-10). Due to exceedances of the national standards for PM-10, the city of Kalispell and the nearby Evergreen area were designated by EPA as nonattainment for PM-10. As a result of this designation, EPA required the Department of Health and Environmental Sciences and the Flathead City-County Health Department to submit the Kalispell PM-10 State Implementation Plan (SIP) to EPA in November 1991. The SIP consists of an emission control plan that controlled fugitive dust emissions from roads, parking lots, construction, and demolition, since technical studies determined these sources to be the major contributors of PM-10 emissions.

Receptor modeling (a model that identifies contributions based on actual area and industrial emissions and ambient data) was originally used to demonstrate attainment of the federal PM-10 standard in the SIP. The EPA is now requiring the department to use a dispersion model (a model that incorporates allowable emission rates from facilities) to assure that attainment can still be demonstrated if individual sources are operating at their maximum allowable emissions rates.

After an analysis, the department determined that emission limitations applicable to the Flathead facility were in some cases nonexistent (no permit required) or several times higher than actual emissions (ARM 17.8.310). Dispersion modeling conducted, using emissions from the Flathead facility at its potential to emit (emissions associated with maximum design capacity or as limited by ARM 17.8.310), indicated that the facility contributed significantly to the PM-10 concentrations in the Kalispell nonattainment area.

In order to demonstrate compliance (through dispersion modeling) with the PM-10 NAAQS in the Kalispell nonattainment area, it was deemed necessary to reduce or establish new emission limitations for the Flathead facility. The new emission limitations established, in conjunction with similar limitations on other Kalispell area facilities, demonstrated through dispersion modeling that compliance with the NAAQS for PM-10 would be attained. The reductions in allowable emissions were enforced through a signed stipulation.

With the proper utilization of control equipment and application of reasonable control techniques (watering or application of dust suppressant) for haul road dust, the department determined that the Flathead facility could operate at maximum design rates and remain in compliance with the stipulated emissions limitations.

Permit #0310-01 was for the replacement of a 1970 Barber Green DA Hot Mix Plant (150 TPH) with a 2000 ADM RB250 asphalt plant (250 TPH), and the addition of a Cat diesel generator (900 kw). Both plants were modeled using screen view to compare the potential impacts associated with each facility. Based on the modeling results, operational limits were placed on the new plant to ensure that the impacts would be less than or equal to the impacts from the old plant.

The current permit action is a modification of permit #0310-01 to correctly identify the diesel generator, used to operate the facility, as a Detroit diesel generator.

VI. Taking or Damaging Implication Analysis

As required by 2-10-101 through 2-10-105, Montana Code Annotated (MCA), the department has conducted a private property takings and damaging assessment and has determined there are no taking or damaging implications.

VII. Environmental Assessment

An environmental assessment, required by Montana Environmental Policy Act, was completed for this project. A copy is attached.

Analysis Prepared By: Ron Lowney
Date: September 21, 2000